



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I**

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2 May 2013

Major Edward Gallagher, Administrative Officer Camp Edwards  
Department of the Army  
Headquarters Camp Edwards  
Beaman Street Building 3468  
Camp Edwards, MA 02542

RE: Training Range and Impact Area, Massachusetts Military Reservation, EPA Docket No.  
SDWA I-97-1030, Modification for M69 Hand Grenade Simulator Training

Dear Major Gallagher:

In a letter dated 25 January 2013, the Massachusetts Army National Guard (MAARNG) requested the United States Environmental Protection Agency (EPA) to modify the Scope of Work (SOW) to Administrative Order SDWA I-97-1030 (AO2) issued pursuant to Section 1431(a) of the Safe Drinking Water Act with respect to the Massachusetts Military Reservation (MMR). Specifically, the MAARNG requested approval to use the M69 Hand Grenade Simulator training device on Camp Edwards.

On 11 March 2013, EPA responded to this request. In its response, EPA proposed to modify AO2 and submitted this proposal for public comment. The public comment period ended on 9 April and no comments have been received from the public.

Thus, this letter constitutes EPA's modification to AO2 to allow the use of the M69 Hand Grenade Simulator at Camp Edwards, based on the conditions of the proposed use.

Background:

In its efforts to protect the sole source Cape Cod Aquifer, EPA has issued four administrative orders at MMR, three pursuant to the Safe Drinking Water Act. The second Administrative Order, known as AO2, was issued in May 1997. Among other provisions, AO2 includes the suspension of particular military training activities at the Training Range and Impact Area of MMR (AO2, Scope of Work, Section II.A.). Among the activities suspended were "[a]ll firing of lead ammunition or other "live" ammunition at small arms ranges at or near the Training Range and Impact Area", (AO2, Scope of Work, Section II.A.1.a), "[a]ll use of artillery and mortar propellants in non-live firing of munitions at or near the Training Range and Impact Area", (AO2, Scope of Work, Section II.A.1.e), and "[a]ll use of pyrotechnics at or near the Training Range and Impact Area", (AO2, Scope of Work, Section II.A.1.f).

AO2 also includes provision for modifying Scope of Work Requirements based on specified demonstrations (Paragraph 125). If a Respondent to AO2 believes that a modification to the Work specified pursuant to AO2 is necessary and appropriate, the Respondent may petition EPA for a determination on the potential modification. Included among the bases for such a modification is "documentation demonstrating that the use of a propellant ... that is suspended pursuant to this Order does not present a threat of harm to the public or the environment that would warrant its continued suspension under this Order" and "documentation demonstrating that the use of a pyrotechnic ... that is suspended pursuant to this Order does not present a threat of harm to the public or the environment that would warrant its continued suspension under this Order."

#### 25 January 2013 MAARNG Petition for Modification:

As described above, the MARRNG petition requested a modification to allow use of the M69 Hand Grenade Simulator for training purposes. According to the petition, this M69 Hand Grenade Simulator would constitute use of a pyrotechnic training tool.

#### EPA Findings:

Per the information submitted with the 25 January 2013 petition, "Use of the M69 Hand Grenade (and M228 fuse) Simulator on Camp Edwards," dated 6 August 2012, the M69 Hand Grenade Simulator contains the following constituents:

##### 0.146 grams Primer Mix

- 43% Barium Nitrate
- 38% Lead Styphnate
- 9% Antimony Sulfide
- 8% Calcium Silicide
- 2% Tetrazene

##### 37.58 grams Propellant M10

- 98% Nitrocellulose
- 1% Potassium Sulfate
- 1% Diphenylamine

##### 0.97 grams Black Powder

- 74% Potassium Nitrate
- 15.6% Charcoal
- 10.4% Sulfur

##### 3.24 grams Black Powder

- 74% Potassium Nitrate
- 15.6% Charcoal
- 10.4% Sulfur

EPA finds that given the amount of contaminants contained in the M69 Hand Grenade Simulator, EPA does not expect that the use of these items in the manner proposed will present a threat to the sole source aquifer. Please note that in making this proposed finding, EPA has not evaluated the areas for safety hazards. MAARNG should be performing its own review of this site for safety-related hazards.



Modification:

Based on the above discussion and findings, EPA hereby modifies AO2 as specified below.

1. Modified AO2, Appendix A (Scope of Work), Section II.A.1.e, and II.A.1.f, as follows:

- e. All use of artillery and mortar propellants in non-live firing of munitions at or near the Training Range and Impact Area; provided however, that the use of the M69 Hand Grenade Simulator, in quantities no greater than 4,300 practice grenades per year shall not be prohibited.
  - i. The authorization is conditioned upon compliance with all conditions established by the Environmental Management Commission.
  - ii. The authorization does not extend to any other ammunition.
  - iii. The proposed use of this ammunition is authorized only to the extent it does not interfere with the completion of investigation activities.
- f. All use of pyrotechnics at or near the Training Range and Impact Area; provided however, that the use of the M69 Hand Grenade Simulator, in quantities no greater than 4,300 practice grenades per year shall not be prohibited.
  - i. The authorization is conditioned upon compliance with all conditions established by the Environmental Management Commission.
  - ii. The authorization does not extend to any other ammunition.
  - iii. The proposed use of this ammunition is authorized only to the extent it does not interfere with the completion of investigation activities.

This action does not modify any other provision of the Statement of Work or the main body of AO2. This modification may itself be modified or withdrawn by EPA at any time on twenty-four hours' written notice. This modification is effective immediately.

If you have any questions about the terms of this modification, please contact me at (617) 918-1210 or Jennings.lynne@epa.gov.

Sincerely,



FOR Lynne A. Jennings  
MMR Team Leader

cc: Len Pinaud, MADEP  
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